

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA

DOCKET NOS. 2017-207-E, 2017-305-E, AND 2017-370-E

IN RE: Friends of the Earth and Sierra Club,) **SOUTH CAROLINA OFFICE**
Complainant/Petitioner v. South Carolina) **OF REGULATORY STAFF'S**
Electric & Gas Company,) **NINTH AND CONTINUING**
Defendant/Respondent) **AUDIT INFORMATION**
) **REQUEST FOR RECORDS**
) **AND INFORMATION**

IN RE: Request of the South Carolina Office of) **SOUTH CAROLINA OFFICE**
Regulatory Staff for Rate Relief to SCE&G) **OF REGULATORY STAFF'S**
Rates Pursuant to S.C. Code Ann. § 58-27-) **EIGHTH AND CONTINUING**
920) **AUDIT INFORMATION**
) **REQUEST FOR RECORDS**
) **AND INFORMATION**

IN RE: Joint Application and Petition of South) **SOUTH CAROLINA OFFICE**
Carolina Electric & Gas Company and) **OF REGULATORY STAFF'S**
Dominion Energy, Incorporated for Review) **EIGHTH AND CONTINUING**
and Approval of a Proposed Business) **AUDIT INFORMATION**
Combination between SCANA Corporation) **REQUEST FOR RECORDS**
and Dominion Energy, Incorporated, as May) **AND INFORMATION**
Be Required, and for a Prudency)
Determination Regarding the Abandonment)
of the V.C. Summer Units 2 & 3 Project)
and Associated Customer Benefits and Cost)
Recovery Plans)

TO: ATTORNEYS FOR SOUTH CAROLINA ELECTRIC & GAS COMPANY:
K. CHAD BURGESS, ESQ., MATTHEW W. GISSENDANNER, ESQ., MITCHELL
WILLOUGHBY, ESQ., AND BELTON T. ZEIGLER, ESQ., REPRESENTATIVES

ATTORNEYS FOR DOMINION ENERGY, INC.:
LISA S. BOOTH, ESQ., ROBERT A. MUCKENFUSS, ESQ., JOSEPH K. REID, III,
ESQ., ELAINE S. RYAN, ESQ., J. DAVID BLACK, ESQ., AND ELLEN T. RUFF,
ESQ.

I. INSTRUCTIONS

The South Carolina Office of Regulatory Staff (“ORS”) hereby requests, pursuant to S.C. Code Ann. §§ 58-4-50(A)(2), 58-4-55(A), 58-27-160, 58-27-1570, 58-27-1580, and 58-33-277 that South Carolina Electric & Gas Company (“SCE&G” or “Company”) and Dominion Energy, Inc. (“Dominion”) (collectively the “Parties” or “Applicants”) provide responses in writing and under oath and serve the undersigned on or before **July 11, 2018** to (1) ORS at 1401 Main Street, Suite 900, Columbia, South Carolina, 29201, (2) Norm Richardson, Anchor Power Solutions, LLC, 32 Dunaire Court, Mableton, GA 30126, (3) Lane Kollen, J. Kennedy and Associates, Inc., 570 Colonial Park Drive, Suite 305, Roswell, GA 30075, and (4) Jones Partners at 1555 W. Astor St., Suite 22W, Chicago, IL 60610. If you are unable to respond to any of the requests, or part or parts thereof, please specify the reason for your inability to respond and state what other knowledge or information you have concerning the unanswered portion.

As used in these audit requests, "identify" means, when asked to identify a person, to provide the full name, business title, address and telephone number. As used in these audit requests, "address" means mailing address and business address. When asked to identify or provide a document, "identify" and “provide” mean to provide a full and detailed description of the document and the name and address of the person who has custody of the document. In lieu of providing a full and detailed description of a document, a copy of the document may be attached with the identity of the person who has custody of it. When the word "document" is used herein, it means any written, printed, typed, graphic, photographic, or electronic matter of any kind or nature and includes, but is not limited to, statements, contracts, agreements, reports, opinions, graphs, books, records, letters, correspondence, notes, notebooks, minutes, diaries, memoranda, transcripts, photographs, pictures, photomicrographs, prints, negatives, motion pictures, sketches, drawings, publications, and tape recordings.

Wherever in this audit request a masculine pronoun or possessive adjective appears, it refers to both males and females in accordance with traditional English usage.

IT IS THEREFORE REQUIRED:

- Pursuant to S.C. Code Ann. § 58-4-55(A) that responses be submitted under oath.
- That SCANA/SCE&G respond only unless Dominion is included in the request.
- All information shall be provided to ORS in the format requested.
- All responses to the requests below must be labeled using the same numbers as the requests.
- Unless otherwise agreed, the requested information shall be bound in 3-ring binders with numbered tabs between each question. The question should be reproduced at the beginning of each tab for the responses included. All exhibits shall be reduced or expanded to 8 ½" x 11" formats, where practical.
- If information requested is found in other places or other exhibits, reference shall not be made to those; instead, reproduce and place a copy of the requested information in the appropriate numerical sequence.
- Any inquiries or communications requesting clarification of the information requested should be directed to Dawn Hipp [803.737.0814], Anthony James [803.737.2090], Jay Jashinsky [803.737.1984], Jeffrey M. Nelson, Esquire [803.737.0823], Jenny Pittman, Esquire [803.737.0794], or Shannon Bowyer Hudson, Esquire [803.737.0889] of ORS.
- This entire list of questions shall be reproduced and included in front of each set of responses.
- Unless otherwise set forth below, the Parties shall provide four (4) sets of CDs with each containing a set of the responses in a searchable format, and seven (7) paper copies/binders of responses to ORS. In addition, the Parties shall load the e-room with the responses the same day the responses are due to ORS. Parties shall provide one (1) set of CDs with each containing a set of the responses in the same format as provided to ORS to (1) Norm Richardson, Anchor Power Solutions, LLC, 32 Dunaire Court, Mableton, GA 30126, [404-348-0096], (2) Lane Kollen, J. Kennedy and Associates, Inc., 570 Colonial Park Drive, Suite 305, Roswell, GA 30075, [770-992-2027], and (3) Jones Partners at 1555 W. Astor St., Suite 22W, Chicago, IL 60610, [312-643-0498], via overnight delivery. Working copies of all spreadsheets (not in Adobe) with all formulas and calculations intact are to be provided to J. Kennedy and Associates (via the e-room) and ORS.
- If the response to any request is that the information requested is not currently available, please state when the information requested will be provided to ORS. This statement is not a waiver of the deadline for all other responses.

- In addition to the signature and verification at the close of the Parties' responses, the Parties' witness(es), employee(s), contractor(s) or agent(s) responsible for the information contained in each response shall be indicated at the bottom of each response.
- This request shall be deemed to be continuing so as to require SCE&G to supplement or amend its responses as any additional information becomes available.
- For responses regarding the V.C. Summer Units 2 & 3 Project, please provide all responses to reflect SCE&G's 55% participation where possible. Where this request is not possible, please clearly identify whether the responses reflect 100% or 55% dollars.
- ORS will object at or prior to a hearing to any attempt by the Joint Applicants to introduce evidence at any hearing which is sought by ORS's Audit Information Requests for Records and Information as to which no disclosure has been made.
- The following Attachments are to be completed or responded to as requested below:
 - Press release from J.D. Power that summarizes the results of the J.D. Power 2017 Electric Utility Residential Customer Satisfaction Study (Attachment 1)
 - Press release from J.D. Power that summarizes the results of the J.D. Power 2017 Electric Utility Business Customer Satisfaction Study (Attachment 2)

Acronyms

For purposes of the following information requests, the following acronyms may apply:

Audit Information Request ("AIR")

Base Load Review Act ("BLRA")

Bechtel Corporation ("Bechtel")

("Consortium") includes any of the following with respect to the NND Project: Westinghouse Electric Co. and its related Westinghouse affiliates, Stone & Webster, The Shaw Group, and CB&I

Dominion Energy, Inc. ("Dominion")

Dominion Energy Services, Inc. ("DES")

Dominion Energy Carolina Gas Transmission ("CGT")

Engineering, Procurement, and Construction ("EPC")

Public Service Commission of South Carolina ("Commission")

SCANA Corporation ("SCANA")

SCANA Services, Inc. ("SCANA Services")

Sedona Corp. ("Sedona")

South Carolina Electric & Gas Company ("SCE&G")

South Carolina Office of Regulatory Staff ("ORS")

V.C. Summer Units 2 & 3 Project ("NND Project")

Vogtle Electric Generating Plant ("Vogtle")

Westinghouse Electric Company and its related Westinghouse affiliates ("Westinghouse")

II. REQUESTS

8-1. Produce correspondence, including e-mails, from SCANA/SCE&G that includes at least one of the following as a sender or "cc":

1. Kevin Marsh,
2. Steve Byrne,
3. Jimmy Addison,
4. Al Bynum,
5. Jeff Archie,
6. Ron Jones,
7. Carlette Walker, or
8. The employee(s) who gained Carlette Walker's duties

to Santee Cooper that includes at least one of the following as a recipient or "cc":

1. Lonnie Carter,
2. Marion Cherry,
3. Michael Crosby,
4. Mike Baxley, or
5. Steve Pelcher

for the period between January 1, 2012 through December 31, 2017, related to the NND Project, Vogtle, or the BLRA and its provisions.

8-2. Provide correspondence, including e-mails, from Santee Cooper that includes at least one of the following as a sender or "cc":

1. Lonnie Carter,
2. Marion Cherry,
3. Michael Crosby,
4. Mike Baxley, or
5. Steve Pelcher

to SCANA/SCE&G that includes at least one of the following as a recipient or "cc":

1. Kevin Marsh,
2. Steve Byrne,
3. Jimmy Addison,
4. Al Bynum,
5. Jeff Archie,
6. Ron Jones,
7. Carlette Walker, or
8. The employee(s) who gained Carlette Walker's duties

for the period between January 1, 2012 through December 31, 2017, related to the NND Project, Vogtle, or the BLRA and its provisions.

- 8-3. Produce all documents related to all meetings attended by Kevin Marsh, Steve Byrne, or Jimmy Addison related to the NND Project, Vogtle, or the BLRA and its provisions for the period between January 1, 2012 through December 31, 2017.
- 8-4. In the final February 5, 2016 Bechtel Report, identify every person involved in making the decision to not include the anticipated completion dates or schedule analysis previously within the November 9, 2015 draft Bechtel report.
- 8-5. Please identify who for SCANA or SCE&G had authority and authorized removal of the anticipated completion dates or schedule analysis from the final February 5, 2016 Bechtel report.
- 8-6. Please list all agreements and the parties to them that contain nondisclosure or confidentiality provisions applicable to Bechtel's 2015 assessment. If SCE&G is in possession of the agreements, please provide them.
- 8-7. Please explain all verbal agreements that occurred between a SCE&G representative, the South Carolina Energy Users Committee, and the Executive Director of ORS as part of the negotiations that led to the 2015 Settlement Agreement approved by the Commission in Docket No. 2015-103-E. Include the verbal agreement regarding observing or being apprised of the negotiations to resolve disputed costs between SCANA/SCE&G and the Consortium/Westinghouse.
- 8-8. Provide all documents and communications between January 1, 2014 through August 1, 2017 regarding the following:
 - a. The scheduled or expected date of substantial completion of Unit 2 and the scheduled or expected date of substantial completion of Unit 3 (documents filed with the Commission may be excluded);
 - b. The financial condition, cash flow problems, and solvency of WEC and Toshiba;
 - c. The financial ability of WEC to pay for or cover costs that exceed the fixed costs set forth in the fixed price option; and

- d. The ability of SCE&G to take advantage of the federal tax credits, and the relationship between that ability and the project's substantial completion dates.
- 8-9. Provide all documents and communications regarding federal tax credits. Documents filed with the Commission may be excluded.
- 8-10. Provide all documents and communications regarding the hiring of bankruptcy counsel to provide guidance as related to the NND Project?
- 8-11. Produce all communications and documents between SCANA\SCE&G and WEC for the period January 1, 2014 through August 1, 2017.
- 8-12. What percentage of outstanding SCANA stock is held by the following categories: by individuals, by retirees of SCANA or SCANA subsidiaries, and by residents of South Carolina?
- 8-13. Do the Joint Applicants intend to utilize revised rates for collection of abandonment costs?
- 8-14. Please (1) list the names and addresses of persons known to Applicants to be witnesses concerning the facts of the consolidated dockets, (2) indicate whether written or recorded statements have been taken from the witnesses, and (3) indicate who has possession of such statements. If the Applicants are in possession of the statements, provide a copy.
- 8-15. Provide photographs of the construction site, warehouses, interior of warehouses, and storage facilities taken between August 2017 and the present date with the dates the photographs were taken.
- 8-16. Please refer to the attached press release from J.D. Power that summarizes the results of the J.D. Power 2017 Electric Utility Residential Customer Satisfaction Study. Further refer to the page that summarizes the results of the South Region: Large Segment Customer Satisfaction Index Ranking. Note that SCE&G scored significantly below the South Large Segment Average. Note also that Dominion Virginia Power scored above average.

Please respond to the following:

- a. Please explain why SCE&G scored well below the South Large Segment average.
- b. Has SCANA and/or SCE&G responded to J.D. Power regarding the results of this study? If so, please provide a copy of all such responses.
- c. Has SCANA and/or SCE&G attempted to address the reasons as to why its residential customer satisfaction score is below average? If so, please explain how.
- d. Has SCANA and/or SCE&G implemented any service quality measures and/or improvements to improve its score? If so, please describe in detail all such measures and how they are or will be implemented. Provide documentation associated with such measures.

- e. Does Dominion have any plans to improve SCE&G's customer satisfaction score? If so, please describe all such plans and measures. Provide documentation associated with such measures.
- 8-17. Please refer to the attached press release from J.D. Power that summarizes the results of the J.D. Power 2017 Electric Utility Business Customer Satisfaction Study. Further refer to the page that summarizes the results of the South Region: Large Segment Customer Satisfaction Index Ranking. Note that SCE&G scored significantly below the South Large Segment Average. Note also that Dominion Virginia Power scored above average.
- Please respond to the following regarding business customer satisfaction:
- a. Please explain why SCE&G scored well below the South Large Segment average.
 - b. Has SCANA and/or SCE&G responded to J.D. Power regarding the results of this study? If so, please provide a copy of all such responses.
 - c. Has SCANA and/or SCE&G attempted to address the reasons as to why its business customer satisfaction score is below average? If so, please explain how.
 - d. Has SCANA and/or SCE&G implemented any service quality measures and/or improvements to improve its score? If so, please describe in detail all such measures and how they are or will be implemented. Provide documentation associated with such measures.
 - e. Does Dominion have any plans to improve SCE&G's customer satisfaction score? If so, please describe all such plans and measures. Provide documentation associated with such measures.
- 8-18. Please provide all documents and calculations in working Excel spreadsheets with all formulas intact to support the Sworn Statement and Exhibits filed by SCE&G for Robert B. Hevert on December 8, 2017, in Docket No. 2017-305-E.

Shannon B. Hudson

Jeffrey M. Nelson, Esquire

Shannon B. Hudson, Esquire

Jenny R. Pittman, Esquire

South Carolina Office of Regulatory Staff

1401 Main Street, Suite 900

Columbia, South Carolina 29201

Telephone: (803) 737-0823

(803) 737-0889

(803) 737-0794

Fax: (803) 737-0895

Email: jnelson@regstaff.sc.gov

shudson@regstaff.sc.gov

jpittman@regstaff.sc.gov

June 27, 2018